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9 *Attorney for Plaintiff, Michael Espinosa*

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 Michael Espinosa, an individual
13 Plaintiff

14 vs.

15 Corrections Corporation of America a/k/a
16 CoreCivic, Inc., a Foreign Corporation
17 domesticated in Nevada, d/b/a Nevada
18 Southern Detention Center; and DOES I
19 through X; and ROE CORPORATIONS XI
20 through XX.
21 Defendants

Case No. 2:19-cv-01617-RFB-NJK

**STIPULATION TO EXTEND TIME FOR
PLAINTIFF MICHAEL ESPINOSA TO
FILE OPPOSITION TO DEFENDANT
CORECIVIC'S MOTION TO DISMISS**

(First Request)

21 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff, Michael Espinosa, and Defendants, Corrections
22 Corporation of America a/k/a CoreCivic, Inc., hereby jointly submit this Stipulation to Extend Time for
23 Plaintiff Michael Espinosa To File Opposition To Defendant CoreCivic's Motion To Dismiss, originally
24 filed on September 20, 2019.

25 Pursuant to Local Rule 7-2(b), the deadline to file an Opposition to Defendant CoreCivic's
26 Motion to Dismiss was October 4, 2019. Plaintiff, Michael Espinosa, and Defendants, Corrections

1 Corporation of America a/k/a CoreCivic, Inc., hereby agree and stipulate to extend the deadline for
2 Plaintiff Michael Espinosa to file an Opposition to Defendant's CoreCivic's Motion To Dismiss to
3 October 11, 2019.

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5 This is the first stipulation for extension of time for Plaintiff Michael Espinosa to file an
6 Opposition to Defendant CoreCivic's Motion to Dismiss.

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8 The reason for this request is that Plaintiff, Michael Espinosa's counsel has been recently
9 handling multiple hearings and depositions and requires additional time to respond, and counsel's staff
10 had a family emergency necessitating travel out of state. Plaintiff, Michael Espinosa, desires to provide
11 the Court a with complete outline of the facts and legal issues.

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13 This Stipulation is made in good faith and is not made for the purposes of delay. The parties
14 agree that no party will be prejudiced by this seven-day extension.

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1 Accordingly, the parties agree and stipulate to extend the deadline for Plaintiff, Michael
2 Espinosa to file an Opposition to Defendant CoreCivic's Motion to Dismiss until October 11, 2019.

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4 DATED this 3rd day of October 2019.

DATED this 3rd day of October 2019.

5 **STRUCK LOVE BOJANOWSKI & ACEDO,**
6 **PLC**

MUELLER & ASSOCIATES, INC.

7 By: /s/ Jacob B. Lee


By: /s/ Craig A. Mueller

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IT IS SO ORDERED:

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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 10th day of October, 2019.